

# TSD File Inventory Index

Date: December 12, 2000

Initial: CM Henricks

<b>Facility Name:</b> <u>Northside Electronics, Inc.</u>			
<b>Facility Identification Number:</b> <u>1LD 005 092 135</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b> <u>A.2</u>	1	<b>.1 Correspondence</b>	
<b>.1 Correspondence</b>	Y	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>	
<b>.2 Notification and Acknowledgment</b>	Y	<b>C.1 Compliance - (Inspection Reports)</b> <u>See C.2</u>	
<b>.3 Part A Application and Amendments</b>	Y	<b>C.2 Compliance/Enforcement</b> <u>C.2</u>	1
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>	Y	<b>.1 Land Disposal Restriction Notifications</b>	
<b>.5 Change Under Interim Status Requests</b>		<b>.2 Import/Export Notifications</b>	
<b>.6 Annual and Biennial Reports</b>	Y	<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>	
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	
<b>.1 Correspondence</b>		<b>.1 RFA Correspondence</b>	
<b>.2 Reports</b>		<b>.2 Background Reports, Supporting Docs and Studies</b>	
<b>A.4 Closure/Post Closure</b>		<b>.3 State Prelim. Investigation Memos</b>	
<b>.1 Correspondence</b> <u>A.4.1 - A.4.4</u>	1	<b>.4 RFA Reports</b> <u>D.1.4</u>	1
<b>.2 Closure/Post Closure Plans, Certificates, etc</b> <u>See A.4.1</u>		<b>D. 2 Corrective Action/Facility Investigation</b>	
<b>A.5 Ambient Air Monitoring</b>		<b>.1 RFI Correspondence</b>	
<b>.1 Correspondence</b>		<b>.2 RFI Workplan</b>	
<b>.2 Reports</b>		<b>.3 RFI Program Reports and Oversight</b>	
<b>B.1 Administrative Record</b>		<b>.4 RFI Draft /Final Report</b>	

Total 5

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater D.3.7		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be included with Reports.

Comments:

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY  
INSPECTION REPORT

USEPA Number: ILD 005092135 IEPA Number: 0311140002  
Facility Name: METHODE ELECTRONICS INC.  
Street: 7444 W. WILSON AVE.  
City: HARWOOD HEIGHTS Telephone: (312) 867-9600  
County: COOK State: ILL. Zip Code: 60656  
Type of Facility: Notified as: GEN. T.S. Regulated as: G 2 (SXT)  
LDF? No HPV? No 90 Day Follow-up required? Yes: ✓ No:      
Region: MAYWOOD Date of Inspection: 12-12-88 From: 9:30am to: 11:30am  
Weather (LDF Only): CLOUDY 25°

Type of Inspection  
ISS: ✓ Sampling:     Citizen Complaint:     Closed:     Other:      
Record Review:     Follow-up to Inspection of:     Withdrawal:    

Non Regulated Status

SOQ:     Claimed Nonhandler:     Other (Specify in Narrative):    

Notification date, 8-11-80, from (initial) or (subsequent) Notif. RECEIVED

Part A

Initial Part A date: 11-14-80 Ammended: 2-26-88

Part A Withdrawal requested:     Approved by (US)(IL)EPA:     SEP 21 1988

Part B Permit Application

Part B Permit called by (US)(IL)EPA on: 5-6-88 Permit Due: 11-8-88

Part B Permit Submitted:     Draft Permit Issued:    

Enforcement

Has the firm been referred to: USEPA? No IAG? No County SA? No

Date(s) of initial referral:    

USEPA CACO:     CAFO:     ALJ Decision:    

Referral to DOJ by USEPA:     Federal Court Order Issued:    

PCB Order Issued:     State Court Order Issued:    

TSD Facility Activity Summary

Activity By Process Code	On Pt. A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being Done at Time of Insp?	Exempt per 35 IAC, Sec.	On Annual Report		
							87	86	85
S01	YES	YES	YES	No	No	No	Y	Y	*
S02	YES	YES	YES	No	No	No	N	N	*
T01	YES	YES	YES	No	No	No	N	N	*
COMPANY REPRESENTATIVE CLAIMS THAT									
* THESE ACTIVITIES DID NOT OCCUR IN 1985					FACILITY ANNUAL REPORT NOT AVAILABLE.				

## WASTE DISPOSITION FORM

Facility Name: METHODE ELECTRONICSUSEPA #: 1LD 005092135IEPA #: 03/1140002

Waste Name (Include haz & non-haz special & waste for which no deter- mination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analy- sis	USEPA Haz Waste #	On	On	On Annual			Amount on Site	Rate of Gener- ation	Last Mani- fested Ship- ment	Disposition
				8700 -12 *	3510 -3 *	8.7 *	8.4 *	8.5 *				
ACETONE; SCREEN WASH: - ACETONE - ACETONE - ACETONE	CLEANING SILK SCREENING EQUIPMENT	2/29/88	F003	No	YES	YES	YES	No	approx. 1 gal.	ALL SOLVENT WASTES TOTAL:	12/7/88	SAFETY KLEEN DOLTON, ILLINOIS RECLAMATION
1,1,1- TRICHLOROETHANE	CLEANING BOARDS IN BACK PLANE ASSEMBLY	2/29/88	F001	No	YES	YES	YES	No	approx. 10 gal.	3-4 DRUMS/ YEAR	4/11/88	SAFETY KLEEN NEWCASTLE, KENTUCKY RECLAMATION
MINERAL SPIRITS	CLEANING PAINT BRUSHES	2/29/88	D001	No	No	No	No	No	none		4/11/88	SAFETY KLEEN NEWCASTLE, KENTUCKY RECLAMATION
ISOPROPYL ALCOHOL	RINSING PARTS IN BACK PLANE DIVISION OF PLANT	2/29/88	D001	No	No	No	No	No	none		12/7/88	SAFETY KLEEN DOLTON, ILLINOIS RECLAMATION
CUTTING OIL	TOOL ROOM	N/A	NON- HAZ.	N/A	N/A	N/A	N/A	N/A	none	✓	12/7/88	MIXED WITH SOLVENTS AND SHIPPED TO SAFETY KLEEN

\* All "No" responses must be explained in the narrative.



0311140002 / Cook County  
Methode Electronics / Harwood Heights  
IL0005092135

## NARRATIVE

Methode Electronics Inc. assembles circuits (back planes and back panels) using purchased components. The company also silk screens circuitry onto resistors, and manufactures additive circuitry (resistors, terminators).

### Hazardous Wastes

#### 1. Acetone; Screen Wash (F003)

- from cleaning silk screening equipment
- shipped to Safety Kleen in Dolton, Illinois for reclamation
- a shipment is made 2-3 times a year
- approximately 1 gallon on site in a 55-gallon drum

#### 2. 1,1,1-Trichloroethane (F001)

- from cleaning boards in back plane assembly
- shipped to Safety Kleen in Newcastle, Kentucky for reclamation
- a shipment is made 2-3 times a year
- approximately 10 gallons on site in a 55-gallon drum

#### 3. Mineral Spirits (D001)

- used sparingly mostly for cleaning paint brushes
- shipped to Safety Kleen in Newcastle, Kentucky for reclamation
- a shipment is made 2-3 times a year
- none was on site

#### 4. Isopropyl Alcohol (D001)

- from rinsing parts in back plane assembly
- shipped to Safety Kleen in Dolton, Illinois for reclamation
- a shipment is made 2-3 times a year
- none was on site

The rate of generation for total spent solvents is approximately 3-4 drums a year. All solvents are currently combined and accumulated as "mixed solvents" except for 1,1,1-Trichloroethane which is accumulated separately.

### Non-Hazardous Special Waste

#### 1. Cutting Oil

- from tool room
- combined with mixed spent solvents and shipped to Safety Kleen
- a shipment is made 2-3 times a year
- extremely small quantities generated
- none was on site

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FEB 21 1989

IEPA-DLFC

Hazardous Waste Units

1. S01 - Printed circuit board treatment area (see photos 1-2)
- located in east plant
  - small room, completely enclosed, and accessed by metal sliding door
  - formerly used for processing of printed circuit boards
  - currently used as a hazardous waste drum accumulation area
  - reinforced concrete floor with wooden curb at doorway
  - 2 drums were in this area
2. S02, T01 - Printed circuit board treatment area
- located in west plant
  - formerly contained 16 tanks used for plating and chemical storage, 5 of which stored or treated hazardous wastes
  - all tanks were removed from this area upon closure of printed circuit board production operations
  - area presently used for storage of light machinery and for light assembly
3. S02, S01 - Hazardous waste drum and tank storage area (See photos 3-4)
- outside, bordering northern end of east plant (completely fenced in)
  - 2 storage slabs separated by a gravel-lined storage area
  - western end is a former tank storage pad composed of cement aggregate material
  - adjacent to above slab is gravel storage area which currently contains assorted pieces of general equipment
  - eastern end is a concrete-lined former hazardous waste drum storage slab which is currently used for storage of equipment and supplies
4. S01 - Drum storage shed (See photo 5)
- metal shed formerly used for hazardous waste drum storage until printed circuit board manufacturing was phased out
  - surrounded by employee parking lot on northern end of property
  - currently used for miscellaneous storage
  - concrete floor; concrete curb encloses entire floor area
  - shed kept locked

A closure plan has been submitted and approved for all of the above units.

# WESTON

9 5 0 0 7 0 0 0 0 3

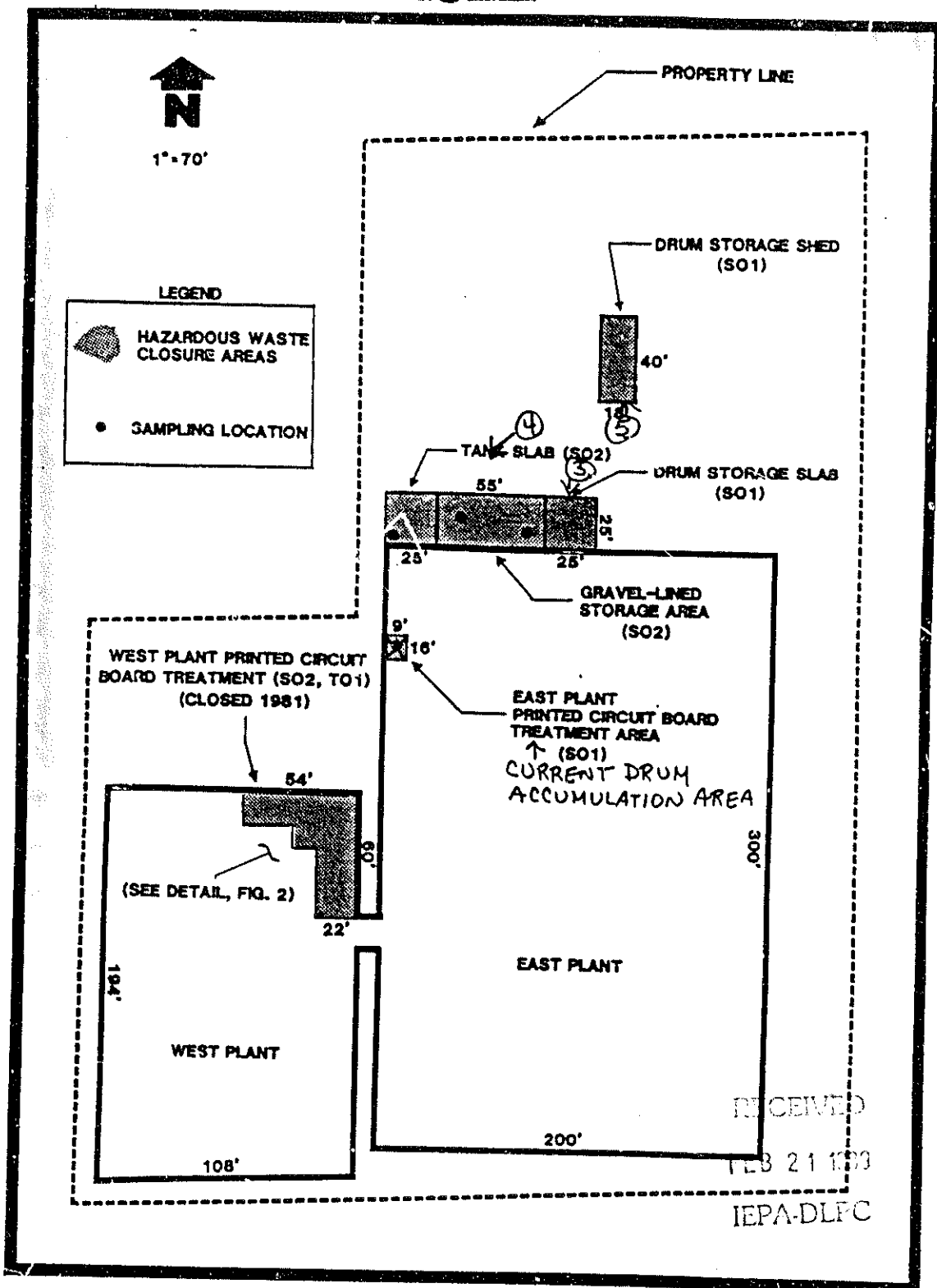


FIGURE 1. HAZARDOUS MATERIALS CLOSURE LOCATIONS FOR METHODE ELECTRONICS, INC.

X =  $\begin{matrix} \textcircled{2} \rightarrow \\ \textcircled{1} \rightarrow \end{matrix}$

2-2

12/12/88

FOS

OUT  
THOMAS

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: METHODE ELECTRONICS INC.  
U.S. EPA I.D. No.: ILD 005092135 031140002  
Street: 7444 W. WILSON AVE.  
City: HARWOOD HEIGHTS State: ILLINOIS Zip Code: 60656  
Telephone: (312) 867-9600  
Operator: METHODE ELECTRONICS INC.  
Street: 7444 W. WILSON AVE.  
City: HARWOOD HEIGHTS State: ILLINOIS Zip Code: 60656  
Telephone: (312) 867-9600  
Owner: METHODE ELECTRONICS INC.  
Street: 7444 W. WILSON AVE.  
City: HARWOOD HEIGHTS State: ILLINOIS Zip Code: 60656  
Telephone: (312) 867-9600  
Inspection Date: 12/12/88 Time: 9:30a - 11:30a Weather Conditions: 25° CLOUDY

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>DONNA CZECH</u>	<u>IEPA</u>	<u>(312) 345-9780</u>

Facility Representatives: BOB KUEHNAU  
MIKE SPEECHLEY  
JOE ADLER

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	<u>✓</u>	<u>✓</u>		
Transporter				
Treater				
Storer				
Disposer				

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## INSPECTION SUMMARY

FOR FACILITY BACK GROUND, SEE RCRA NARRATIVE.

### LAND BAN VIOLATIONS:

- 1) FACILITY HAS NOT CORRECTLY DETERMINED THE APPROPRIATE TREATABILITY GROUP OF ITS WASTE  
F SOLVENTS CLASSIFIED AS D001
- 2) NOTIFICATION TO TSD FACILITY DOES NOT INCLUDE MANIFEST NUMBER. (NOTIFICATION REPORTS CURRENTLY SUPPLIED BY SAFETY KLEEN)

## N A R R A T I V E

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  - shed kept locked

A closure plant has been submitted and approved for all of the above units.

Notes

Methode Electronics Inc. manufactured printed circuit boards from 1965 until this operation ceased in 1981. Since this production process ceased, all of the storage tanks have been removed from the site. As of the suspension of the circuit board production operation, Methode Electronics is generating considerably less hazardous waste. Upon completion of closure of all of the above hazardous waste units, this company intends to withdraw its Part A and operate as a generator only. The company is currently operating as a generator subject to reduced requirements and is apparently accumulating waste for less than 180 days.

Apparent Violations (\* denotes continuing violation)

- 722.111 - Improper hazardous waste determination resulting in the misidentification of F-solvents as D001 waste.
- 722.134(d) - Required information not posted near telephone including: name and phone number of emergency coordinator; location of fire extinguishers; spill control equipment, and fire alarm (if present); phone number of fire department.
  - (722.134(a)) - 2 drums in accumulation area with no accumulation dates on them and not identified with the words "Hazardous Waste".
  - (725.137)\* - No arrangements made with local police and fire departments or with local hospitals.

# **RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
<b>A.</b>	<b><u>F-Solvent Wastes</u></b>					
1.	F001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	F002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	F003	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	F005	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes NONE GENERATED**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium VI	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mercury	20 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	134 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Selenium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thallium	130 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



No CALIFORNIA WASTE GENERATED

APP

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm \_\_\_\_\_

500 ppm \_\_\_\_\_

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

\_\_\_\_\_

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes *NONE GENERATED*

- Note: (1) The detailed description for waste codes are listed in Appendix C.  
 (2) EPA has promulgated the treatment standards for the following waste code with \*.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____



	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

\_\_\_\_\_ Yes      ☒ No      \_\_\_\_\_ NA

F-SOLVENTS  
CLASSIFIED AS  
D001

If yes, check the appropriate treatability group.

- \_\_\_\_\_ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
 \_\_\_\_\_ Pharmaceutical wastewater containing spent methylene chloride  
 \_\_\_\_\_ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

NONE  
GENERATED

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

GEN

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

NONE  
GENERATED

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

If yes, check the appropriate treatability group.

\_\_\_\_ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)  
\_\_\_\_ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

## B. Waste Analysis

### 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

\_\_\_\_ ☒ Yes      \_\_\_\_ No      \_\_\_\_ NA

How was this determination made?

- Knowledge of waste

\_\_\_\_ ☒ Yes      \_\_\_\_ No

If yes, is any supporting data available for review? Describe how this is adequate. F-SOLVENTS USED TO CLEAN EQUIPMENT; WASTE CONSISTS OF MIXTURE OF SPENT SOLVENTS.

- TCLP

\_\_\_\_ Yes      \_\_\_\_ ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes      ☐ No      ☐ NA

If yes, specify the waste stream:

F001, F003, F004

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes      ☒ No      ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

F-SOLVENT WASTES ANALYZED BY SAFETY-KLEEN  
PRIOR TO SOLVENT RECLAMATION.

2. California List Wastes NONE GENERATED

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes      ☐ No      ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes      ☐ No      ☐ NA

What type of absorbent is used? \_\_\_\_\_

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes      ☐ No      ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. \_\_\_\_\_

- Testing \_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, list test method used: \_\_\_\_\_

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

3. First Third Wastes: *NONE GENERATED*

a. Does the generator correctly determine the appropriate treatment standard of the waste?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Soft hammer

If yes, specify the waste stream: \_\_\_\_\_

How was this determination made?

- Knowledge of waste

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, is any supporting data available for review? Describe how this is adequate. \_\_\_\_\_



- TCLP

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

- Total Constituent Analysis

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

d. How does the generator test the waste when a process or waste stream changes?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### C. Management

#### 1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

\_\_\_\_\_ Yes      ✓ No

If yes, the TSD Checklist must be completed.

FACILITY GOING THROUGH  
CLOSURE - NO STORAGE  
OCCURRING CURRENTLY

#### 2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes      \_\_\_\_\_ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

✓ Yes      \_\_\_\_\_ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: SAFETY-KLEEN  
IN DOLTON, ILLINOIS & SAFETY KLEEN IN NEWCASTLE,  
KENTUCKY.

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

NO DISPOSAL  
ALL F-SOLVENTS  
ARE RECLAIMED

f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☐ No

**D. Demonstration and Certification -- "Soft Hammer" Wastes**

NONE GENERATED

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

☐ Yes ☐ No

Addresses

☐ Yes ☐ No

Telephone Numbers

☐ Yes ☐ No

Contact dates

☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

Describe the type of treatment and treatment facilities \_\_\_\_\_

\_\_\_\_\_

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

\_\_\_\_\_ Yes \_\_\_\_\_ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number \_\_\_\_\_ Yes \_\_\_\_\_ No

(ii) Manifest number \_\_\_\_\_ Yes \_\_\_\_\_ No

(iii) Waste analysis data, if available \_\_\_\_\_ Yes \_\_\_\_\_ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

\_\_\_\_\_ Yes \_\_\_\_\_ No

**E. Treatment Using RCRA 264/265 Exempt Units or Processes**  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

*NO SUCH UNITS  
AT THIS FACILITY*

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, list types of waste treatment units and processes:

\_\_\_\_\_

22 MAR 1989

5HR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Mike Speechley  
Methode Electronics, Inc.  
7444 W. Wilson Avenue  
Harwood Heights, Illinois 60656

Re: Notice of Violation  
Methode Electronics, Inc.  
ILD 005 092 135

Dear Mr. Speechley:

On December 12, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions (40 CFR Part 268) section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste, as required by Section 269.41; and
2. Failure to provide in the separate written notice attached to the manifest for each shipment of F-solvent wastes, the hazardous waste manifest number, as required by Section 268.7(a)(1).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.



If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312 886-4581.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Harry Chappel, IEPA  
Glen Savage, IEPA

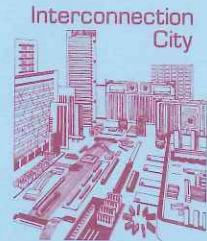
5HR-12:Z.THOMAS:disk #1:or:3-7925:03/17/89:PC FILENAME: Speechley

O.R. 3/21/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	27 3/22/89	P.E.D. 3.22.89	



RECEIVED  
MAR 31 1989  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V



7444 W. WILSON AVE. • CHICAGO, ILL. 60656

TWX 910-221-2468

TELEPHONE (312) 867-9600

March 29, 1989

IL/MI/WI Enforcement Program Section  
United States Environmental Protection  
Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Attention: 5HR-12

Re: Notice of Violation  
Methode Electronics, Inc.  
ILD 005 092 135

Ladies and Gentlemen:

The violations cited during an RCRA inspection on December 12, 1988, by the Illinois Environmental Protection Agency have been addressed by issuance of the enclosed memorandum. If any further action is considered necessary by our agency, please let me know. Absent any response from your agency, I will consider the cited violations corrected.

Very truly yours,

A handwritten signature in purple ink, reading 'Robert J. Kuehnau'.  
Robert J. Kuehnau  
Corporate Controller

jg  
enclosure



INTER-OFFICE MEMORANDUM

To: Mike Speechley

Date: March 27, 1989

Subject: HAZARDOUS WASTE SHIPMENTS

During an inspection visit to our facility by the Illinois Environmental Protection Agency (ILEPA), it was determined that we misidentified F-solvent waste as D001 waste. Apparently some Acetone waste was included with alcohol/resin wastes and identified on the Uniform Hazardous Waste Manifest as D001-Flammable Liquid Waste. Whenever F-solvent wastes are included in a drum of hazardous waste, such wastes take precedence and the waste shipment must be identified as F-solvent waste. In addition, a separate written notice stating that the waste is subject to the Land Disposal Restrictions of 40 CFR Part 268 must be attached to the manifest for all shipments of F-solvents, crossreferenced with the appropriate Uniform Hazardous Waste Manifest number. A supply of NOTICE FORMS is attached for your use.

A handwritten signature in cursive script, appearing to read 'Bob'.

Bob Kuehnau

jg  
attachment

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO \_\_\_\_\_  
 DESIGNATED \_\_\_\_\_  
 FACILITY: \_\_\_\_\_

EPA ID NO. \_\_\_\_\_

Under manifest number \_\_\_\_\_ the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator is hereby providing notice that the waste is restricted and the appropriate treatment standards (from Table CCWE of 40 CFR 268.41) are as follows:

<u>Constituent</u>	<u>Treatment Standard</u>
_____	_____ ppm Use reverse side
_____	_____ ppm for additional
_____	_____ ppm constituents

The constituent compositions based upon ( ) attached data or ( ) knowledge of the waste

TABLE CCWE-CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
Acetone.....	0.05	0.59
n-Butyl alcohol.....	5.0	5.0
Carbon disulfide.....	1.05	4.81
Carbon tetrachloride.....	.05	.96
Chlorobenzene.....	.15	.05
Cresols (and cresylic acid).....	2.82	.75
Cyclohexanone.....	.125	.75
1,2-Dichlorobenzene.....	.65	.125
Ethyl acetate.....	.05	.75
Ethylbenzene.....	.05	.053
Ethyl ether.....	.05	.75
Isobutanol.....	5.0	5.0
Methanol.....	.25	.75
Methylene chloride.....	.20	.96
Methylene chloride (from the pharmaceutical industry).....	12.7	.96
Methyl ethyl ketone.....	0.05	0.75
Methyl isobutyl ketone.....	0.05	0.33
Nitrobenzene.....	0.66	0.125
Pyridine.....	1.12	0.33
Tetrachloroethylene.....	0.079	0.05
Toluene.....	1.12	0.33
1,1,1-Trichloroethane.....	1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluoroethane.....	1.05	0.96
Trichloroethylene.....	0.062	0.091
Trichlorofluoromethane.....	0.05	0.96
Xylene.....	0.05	0.15

EPA

Generator Name \_\_\_\_\_ ID#: \_\_\_\_\_

Generator Representative Signature \_\_\_\_\_

Name & Title of Representative \_\_\_\_\_

(print or type)

05 APR 1989

5HR-12

Mr. Mike Speechley  
Methode Electronics, Inc.  
7444 West Wilson Avenue  
Harwood Heights, Illinois 60656

Re: Methode Electronics, Inc.  
ILD 005 092 135

Dear Mr. Speechley:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on March 29, 1989. The stated actions appear to adequately address the land disposal restriction deficiencies outlined in our March 22, 1989, Notice of Violations.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Glen Savage, IEPA, FOS  
Harry Chappel, IEPA, CMS

5HR-12:THOMAS:or:OR/04/03/89/:DISK #1:PC FILENAME:SPEECHLEY

25/4/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	25 4/4/89	P.E.D. 4-4-89	





Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 0311140002 -- Cook County  
Methode Electronics, Inc.  
ILDO05092135  
RCRA - Permits

May 6, 1988

Methode Electronics, Inc.  
7444 W. Wilson  
Harwood Heights, Illinois 60656

Attn: Environmental Coordinator or  
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.





Page 2

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



Page 3

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:JKH:rd1313j/1314j

Enclosures

cc: Division File  
Compliance  
Haywood Region  
USEPA Region V



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

02 MAY 1988

5HS-12

Mr. Robert J. Kuehnau  
Corporate Controller  
Methode Electronics  
7444 West Wilson Avenue  
Hardwood Heights, Illinois 60656

Re: Methode Electronics  
ILD 005 092 135

Dear Mr. Kuehnau:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on April 18, 1988. The stated actions appear to adequately address the land disposal restrictions deficiency outlined in our April 5, 1988, letter.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

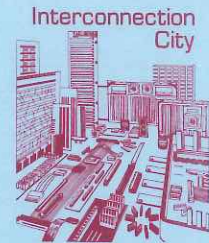
cc: Glenn Savage, IEPA, FOS  
Harry Chappel, IEPA, CMS

5HS-12:ZTHOMAS:4/26/88:ev

DISK #3

## CONCURRENCES

SYMBOL							
SURNAME	E.V.	26		P.S.D.			
DATE	4-28-88	4/29/88		4-29-88			



7444 W. WILSON AVE. • CHICAGO, ILL. 60656

TWX 910-221-2468

TELEPHONE (312) 867-9600

April 18, 1988


Ms. Zetta Thomas  
U. S. Environmental Protection Agency  
Region 5 (5HS - 12)  
230 South Dearborn Street  
Chicago, Illinois 60604

RE: Methode Electronics, Inc.  
ILD 005092135

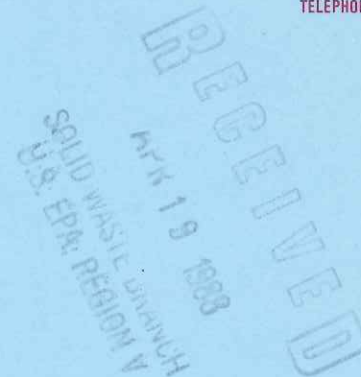
Dear Ms. Thomas:

We have received the correspondence regarding the form for "Notice of Land Disposal Retriktion of Waste" and have amended the Waste Analysis Plan portion of our Hazardous Waste Operating Record accordingly (copy enclosed for your files). All Methode shipments of F-solvent wastes will be accompanied by this form.

Very truly yours,

  
Robert J. Kuehnau  
Corporate Controller

jak  
enclosure



METHODE ELECTRONICS, INC.  
WASTE ANALYSIS PLAN  
40 CFR PART 268 ADDENDUM

Land Disposal Restrictions (LDR) of 40 CFR Part 268 become effective on November 8, 1986 and prohibit land disposal of spent solvent wastes specified as EPA Hazardous Wastes Nos. F001, F002, F003, F004 and F005 unless certain treatment standards are met.

Although Methode's spent solvent wastes are recycled by Safety-Kleen Corporation, there are certain procedures with which we must comply to satisfy this section of the regulations. Accordingly, for each shipment of hazardous wastes, it will be necessary to perform the following:

1. Determine the treatability group of the waste as required by Section 268.41 using Appendix II to Part 268 - Treatment Standards (copy attached). Methode's spent solvent waste will always fall under the "all other" treatability group.
2. Instruct Safety-Kleen Corp., as part of its analysis procedures for any waste to test to determine if it exceeds treatment standards and, therefore, is restricted from land disposal under Section 268.
3. Each shipment of F-solvent wastes taken by Safety-Kleen or other licensed waste hauler for disposal must be accompanied by written notice separately attached to the manifest which includes the following information:
  - a. EPA Hazardous Waste Number;
  - b. The corresponding treatment standard (per Appendix II to Part 268 - Treatment Standards, copy attached);
  - c. The manifest number associated with the shipment waste; and
  - d. Waste analysis data, where applicable.

A form that satisfies such written notice requirement follows.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO \_\_\_\_\_  
 DESIGNATED \_\_\_\_\_  
 FACILITY: \_\_\_\_\_

EPA ID NO. \_\_\_\_\_

Under manifest number \_\_\_\_\_ the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator is hereby providing notice that the waste is restricted and the appropriate treatment standards (from Table CCWE of 40 CFR 268.41) are as follows:

Constituent

Treatment Standard

_____	_____ ppm	Use reverse side
_____	_____ ppm	for additional
_____	_____ ppm	constituents

The constituent compositions based upon ( ) attached data or ( ) knowledge of the waste

TABLE CCWE-CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
Acetone.....	0.05	0.59
n-Butyl alcohol.....	5.0	5.0
Carbon disulfide.....	1.05	4.81
Carbon tetrachloride.....	.05	.96
Chlorobenzene.....	.15	.05
Cresols (and cresylic acid).....	2.82	.75
Cyclohexanone.....	.125	.75
1,2-Dichlorobenzene.....	.65	.125
Ethyl acetate.....	.05	.75
Ethylbenzene.....	.05	.053
Ethyl ether.....	.05	.75
Isobutanol.....	5.0	5.0
Methanol.....	.25	.75
Methylene chloride.....	.20	.96
Methylene chloride (from the pharmaceutical industry).....	12.7	.96
Methyl ethyl ketone.....	0.05	0.75
Methyl isobutyl ketone.....	0.05	0.33
Nitrobenzene.....	0.66	0.125
Pyridine.....	1.12	0.33
Tetrachloroethylene.....	0.079	0.05
Toulene.....	1.12	0.33
1,1,1-Trichloroethane.....	1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluoroethane.....	1.05	0.96
Trichloroethylene.....	0.062	0.091
Trichlorofluoromethane.....	0.05	0.96
Xylene.....	0.05	0.15

EPA

Generator Name \_\_\_\_\_ ID#: \_\_\_\_\_

Generator Representative Signature \_\_\_\_\_

Name & Title of Representative \_\_\_\_\_

(print or type)



05 APR 1988

5HS-12

Mr. B. Jensen  
Methode Electronics  
7444 West Wilson Avenue  
Hardwood Heights, Illinois 60656

Re: Methode Electronics  
ILD 005 092 135

Dear Mr. Jensen:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on March 18, 1988. The stated actions did not adequately address the land disposal restrictions deficiencies outlined in our February 16, 1988, Notice of Violation.

Your response did not include the notification requirement found under 40 CFR Section 268.7(a)(1). The written notification must be separately attached to the manifest with each shipment of F-solvent wastes. The notification should include the information as follows:

The U.S. EPA hazardous waste number, the applicable treatment standard, manifest number, and waste analysis data, where available.

Enclosed to assist you is a copy of the notification. Should you have further questions, please feel free to contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

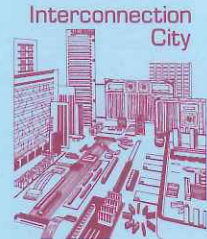
Paul Dimock, Chief  
IL/MI/WI Enforcement Programs Section

Enclosure

cc: Glenn Savage, IEPA, FOS  
Harry Chappel, IEPA, CMS

5HS-12:ZTHOMAS:3/30/88:ev DISK #3

SEARCHED	INDEXED	SERIALIZED	FILED	APR 11 1988	IL/MI/WI
E.V.				4-1-88	4-1-88
P.P.D.				4-4-88	



7444 W. WILSON AVE. • CHICAGO, ILL. 60656

TWX 910-221-2468

TELEPHONE (312) 867-9600

RECEIVED  
MAR 21 1988  
U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

March 18, 1988

Mr. William E. Munro, Chief  
RCRA Enforcement Branch  
United States Environmental  
Protection Agency  
Region 5 (5HS-12)  
230 South Dearborn Street  
Chicago, Illinois 60604

RE: Notice of Violation  
Methode Electronics, Inc.  
ILD 005 092 135

Dear Mr. Munro:

Enclosed is a copy of our Hazardous Waste Operating Record which was prepared and submitted to the Illinois EPA as a result of its June 29, 1987 inspection of our facility. Such Operating Record has been amended to comply with the Land Disposal Restrictions of 40 CFR Part 268.

All of our waste solvents have been sampled by Safety-Kleen Corporation, and we are awaiting the results of its analysis. We fully expect that all such spent solvents will qualify for recycling by Safety-Kleen, however, any that cannot be recycled will be disposed of in compliance with the Land Disposal Restrictions.

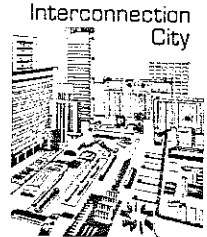
If you have any questions regarding this response or need any further information, please contact me at (312) 867-9600.

Very truly yours,

A handwritten signature in blue ink that reads 'Robert J. Kuehnau'.

Robert J. Kuehnau  
Corporate Controller

jak  
enclosure



7444 W. WILSON AVE. • CHICAGO, ILL. 60656

TWX 910-221-2468

TELEPHONE (312) 867-9600

**METHODE ELECTRONICS, INC.  
HAZARDOUS WASTE OPERATING RECORDS**

A written operating record will be maintained for all activities of the Drum Storage Area. Michael Speechley will be responsible for maintaining the operating record. Such written operating record will include the following:

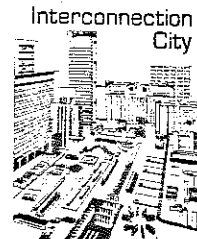
1. An inventory of hazardous waste on hand in the drum storage area at February 24, 1988 showing the following information:
  - a. Common name of waste
  - b. EPA hazardous waste number (i.e., F001)
  - c. Physical form of waste (i.e., liquid, solid, etc.)
  - d. Estimated weight, or volume and density, in unit of measure (i.e., G = gallon).
  - e. The EPA storage handling code (i.e., SOI = containerized in barrels, drums, etc.)
2. A log recording by date of transaction all of the information listed in number 1 above for each receipt waste material into the drum storage areas and each removal of waste material by an authorized hazardous waste hauler for disposal. Such log will also record the EPA manifest number for all waste removed by authorized waste haulers.
3. An inspection schedule and a log of weekly inspections of the drum storage area.
4. A written waste analysis plan:
5. A copy of all waste analysis reports performed prior to removal by authorized waste haulers.

6. A building diagram showing the location of the drum storage area.
7. Summaries and details of any incidents that required any remedial procedures or implementation of a contingency plan.
8. A copy of all closure cost estimates.



METHODE ELECTRONICS, INC.  
HAZARDOUS WASTE OPERATING LOG

[illegible]



7444 W. WILSON AVE. • CHICAGO, ILL. 60656

TWX 910-221-2468

TELEPHONE (312) 867-9600

**METHODE ELECTRONICS, INC.  
DRUM STORAGE AREA INSPECTION SCHEDULE**

The drum storage area will be inspected each week on Monday morning. If Monday falls on a holiday, the inspection will be performed on the first workday following the holiday. In addition, the drum storage area will be inspected each time material is added to or removed from the area. Michael Speechley will be responsible for performing the inspection. In Michael's absence, the inspection will be performed by

The inspection will consist of the following procedures:

1. Inspect the floor of the drum storage room for signs of spills or leaks.
2. Inspect all drums, drum rims and drum openings for signs of corrosion and possible leakage.
3. Note that the fire door to the drum storage room is closed except when material is being added or removed.
4. Take remedial action immediately if the inspection reveals any hazardous conditions:
  - a. Clean up any spills using an oil dry compound.
  - b. Transfer all material from any drum discovered to be corroding or leaking to replacement drums.
5. Record the date, time and individual performing each inspection and the results thereof in the inspection log including the date and nature of any repairs or other remedial actions. Such log must be kept on site for a minimum of three years.

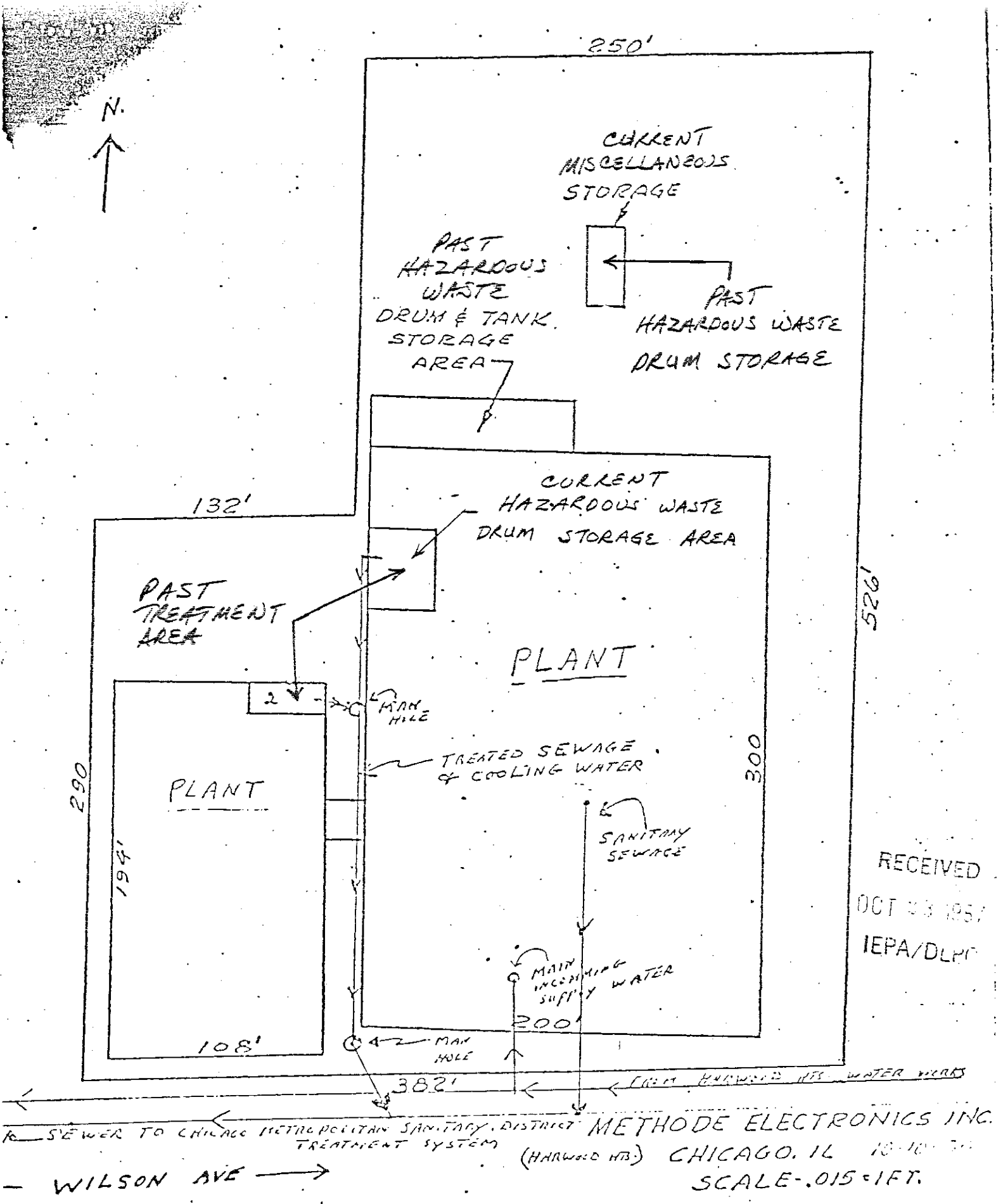
METHODE ELECTRONICS, INC.  
DRUM STORAGE AREA INSPECTION LOG

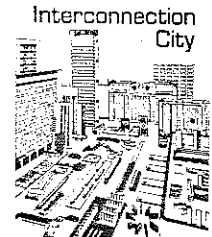
[illegible]

\* Indicate with checkmark that procedure performed in accordance with Inspection Schedule.

METHODE ELECTRONICS, INC.  
HAZARDOUS WASTE INVENTORY  
February 25, 1988

Common Name of Waste	E.P.A. #	Quantity	Unit of Measure	Method of Handling Code	
1. 117 TOLUENE	FC001	45	gAL	S01	
2. ACETONE	FC003	55	gAL	S01	
ISO PROPYL Alcohol (IPA)	UNLISTED			S01	
DIACETONE Alcohol (DAA)	UNLISTED			S01	- Diacetone Alcohol
TOLUENE	FC005			S01	
3. ACETONE	FC003	55	gAL	S01	
IPA	UNLISTED			S01	- iso propyl Alcohol
IPA	UNLISTED			S01	
TOLUENE	FC005			S01	
4. ACETONE	FC003	55	gAL	S01	
IPA	UNLISTED			S01	
IPA	UNLISTED			S01	
TOL	FC005			S01	(Toluene)
5. PAINT THINNER & MAINTENANCE CLEANING SUPPLIES		55	gAL	S01	
6. DEWAXING FLUID & OILS (FC003)		25	gAL	S01	





7444 W. WILSON AVE. • CHICAGO, ILL. 60656

TWX 910-221-2468

TELEPHONE (312) 867-9600

**METHODE ELECTRONICS, INC.  
WASTE ANALYSIS PLAN**

Methode is required to have on record a detailed chemical and physical analysis of a representative sample of the waste material stored on its premises. Such analyses must contain all of the information which must be known to store the waste in accordance with the ILEPA regulations.

Methode does not have the sophisticated equipment necessary to perform such analyses, therefore, Safety Kleen Corporation of Elgin, Illinois, will be contracted to perform the necessary analyses in accordance with 35 Ill. Adm. Code 725.113. Safety Kleen will sample and analyze all waste on hand at February 26, 1988, and a written record of its sampling method, the parameters for which each waste was analyzed and the rationale for the selection of such parameters will be requested and included in Methode's Hazardous Waste Operating Record.

Safety Kleen will perform an analysis and provide the necessary documentation to comply with 35 Ill. Adm. Code 725.113 each time a waste drum is removed for disposal. Unless the manufacturing processes generating the hazardous wastes change, an analysis at the time of disposal will be adequate to insure that Methode's analysis records are accurate and up-to-date.

If the manufacturing process changes in such a way that would change the type of hazardous wastes being generated, Safety Kleen should be contacted to sample and analyze such waste on a timely basis rather than waiting until a 55 gallon drum has accumulated and is ready for disposal. Safety Kleen's report on any such analysis will also be made a part of Methode's Hazardous Waste Operating Record.

METHODE ELECTRONICS, INC.  
WASTE ANALYSIS PLAN  
40 CFR PART 268 ADDENDUM

Land Disposal Restrictions (LDR) of 40 CFR Part 268 become effective on November 8, 1986 and prohibit land disposal of spent solvent wastes specified as EPA Hazardous Waste Nos. F001, F002, F003, F004 and F005 unless certain treatment standards are met.

Although Methode's spent solvent wastes are recycled by Safety-Kleen Corporation, there are certain procedures with which we must comply to satisfy this section of the regulations. Accordingly, for each shipment of hazardous wastes, it will be necessary to perform the following:

1. Determine the treatability group of the waste as required by Section 268.41 using Appendix II to Part 268 -Treatment Standards (copy attached). Methode's spent solvent waste will always fall under the "all other" treatability group.
2. Instruct Safety-Kleen Corp., as part of its analysis procedures for any waste that cannot be recycled to test the waste to determine if it exceeds treatment standards and, therefore, is restricted from land disposal under Section 268.
3. For all wastes that cannot be recycled and which are determined by Safety-Kleen Corp. to exceed the applicable treatment standards, each shipment taken by Safety-Kleen for disposal must be accompanied by written notice including the following information:
  - a. EPA Hazardous Waste Number;
  - b. The corresponding treatment standard (per Appendix II to Part 268 - Treatment Standards, copy attached);
  - c. The manifest number associated with the shipment of waste; and
  - d. Waste analysis data, where applicable.

METHODE ELECTRONICS, INC.  
CLOSURE COST ESTIMATE

		<u>Removal Cost</u>	<u>Extension</u>
Maximum number of waste drums expected to be on hand at any time	5 drums	\$150/dr.*	\$ 750.00
Maximum number of virgin material on hand at any time	10 drums	\$150/dr.*	1,500.00
In-house labor to remove drums and clean drum storage area	8 hours	\$12/hr.	96.00
Contingency			<u>154.00</u>
TOTAL ESTIMATED CLOSURE COST			<u>\$2,500.00</u>

\* Based upon current quote from Safety Kleen Corporation.



Z. Thomas (5HS-12) 230 S. Dearborn, Chicago, IL  
60604

P 759 199 396  
**RECEIPT FOR CERTIFIED MAIL**  
NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

Sent to <b>Mr. B. Jensen</b>		
Street and No. <b>7444 West Wilson Avenue</b>		
P.O., State and ZIP Code <b>Hardwood Heights, IL 60656</b>		
Postage	\$ <b>73</b>	
Certified Fee	<b>75</b>	
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt showing to whom and Date Delivered	<b>70</b>	
Return Receipt showing to whom, Date, and Address of Delivery		
TOTAL Postage and Fees	\$ <b>2.18</b>	
Postmark or Date		

PS Form 3800, June 1985

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to:

**Mr. B. Jensen  
Methode Electronics  
7444 West Wilson Avenue  
Hardwood Heights, Illinois 60656**

4. Article Number

**P 759 199 396**

Type of Service:

- ☐ Registered ☐ Insured  
☒ Certified ☐ COD  
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee

**X**

6. Signature — Agent

**X**

7. Date of Delivery

**2-18-85**

8. Addressee's Address (ONLY if requested and fee paid)

16 FEB 1988

5HS-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. B. Jensen  
Methode Electronics  
7444 West Wilson Avenue  
Hardwood Heights, Illinois 60656

Re: Notice of Violation  
Methode Electronics  
ILD 005 092 135

Dear Mr. Jensen:

On June 29, 1987, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Land Disposal Restrictions (LDR) of certain spent solvents. The land disposal restrictions became effective on November 8, 1986, (reference 51 Federal Register 40636: 40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270).

With respect to the land disposal requirements section of the inspection, your facility was found to be in violation of certain land disposal requirements as noted below:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a);
3. Failure to notify in writing for each shipment of F-solvent wastes the applicable treatment standard, U.S. EPA hazardous waste number, manifest number, waste analysis data, if available as required by Section 268.7(a)(1);



4. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13; and
5. Failure to maintain a complete operating record to include 40 CFR Part 268 requirements in accordance with Section 265.73.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

**ORIGINAL SIGNED BY**  
**WILLIAM E. MUNO**

William E. Muno, Chief  
RCRA Enforcement Branch

Enclosure

cc: Harry Chappel, IEPA  
Glenn Savage, IEPA

bcc: Paul Dimock

5HE-12:ZTHOMAS:1/21/88:ea: DISK #7 DOCUMENT 13

REV. DATE	TYPIST	REVIEWER	OTHER STAFF	UNIT CHIEF	SECT. SECTY	SECT. CHIEF	INVED CHIEF	INVED CR
2-10-88	EG	BT 2/10/88		PER 2-10-88	AP 2/11/88	WEM 2/11/88		



USEPA Number: IL001250921.35

IEPA Number: 031140002

Facility Name: METHODE ELECTRONICS

Street: 7444 WEST WILSON AVE  
City: "

City: HARBORLAND HEIGHTS

County: COOK

State: TX

Telephone: 312/862-9600

Zip Code: 60656

Type of Facility: Notified As: GEN/TSD

Regulated As: ~~Asbestos~~

LDF? yes ☐ no ☒ HPV? yes ☐ no ☒ 90 Day Follow-up Required? yes ☐ no ☒

Region: 2 Date of Inspection: 6-29-87 NEW DISCOVERY DATE 9/11/87 BB 10/2/87

Weather (LDF Only): N/A Date of Inspection: 6-29-82 From: 1:00pm to 3:30pm

Type of Inspection

ISS: ☒ Sampling:

Citizen Complaint:

Closed:

Withdrawal:

Record Review:      Follow-up to Inspection of     

Other:

Non Regulated Status

Small Quant. Gen.:      Claimed Nonhandler:      Other (Specify in narrative):                 

Notified As/Regulated As Matrix Number: 39 Key Letter: E

Notification date, 8-11-80, from initial ☒ or subsequent ☐ notification.

Part A date, 11-13-80 from initial ✓ or amended     Part A withdrawn:    

Part B permit application submitted? yes      no     

Has the firm been referred to: USEPA? yes no ☒ IAG? yes no ☒; County States Attorney? yes no ☒ Date of referral to USEPA: N/A; IAG: N/A, County States Attorney: N/A.

IAG: N/A, County States Attorney: N/A. Date of referral to USEPA: N/A

Federal Court Order Issued: N/A State Court Order Issued: N/A

USEPA CAFO Issued: N/A CAFO Issued: N/A ALJ Decision Issued: N/A

Illinois PCB Order Issued: N/A

TSD Facility Activity Summary

[illegible]

## WASTE DISPOSITION FORM

Facility Name: METRODE ELECTRONICS

USEPA #: TL0005092135 IEPA #: 0311141

[illegible]

\* All "no" responses must be explained in the narrative

NARRATIVE

RECEIVED

OCT 23 1981

IEPA/DLPC

A ISS INSPECTION WAS CONDUCTED AT METHODE ELECTRONICS ON JUNE 29, 1982. I MET WITH MR. JENSEN AND MR. KUEHNALL. THIS FACILITY, USED TO MANUFACTURE PRINTED CIRCUIT BOARDS, INVOLVING A ELECTROPLATING AND ETCHING OPERATION. OPERATION CLOSED DOWN AROUND JULY 1981. CURRENT OPERATIONS ARE: SILK SCREENING AND PLASTIC MOLDING ASSEMBLY. DURING THE AGENCY'S MAY 25, 1982 INSPECTION, METHODE ELECTRONICS HAD APPROXIMATELY 25 DRUMS CONTAINING PRIMARILY WASTE WATER. TREATMENT SLOTTES, SPENT PERCHLOROETHYLENE, 1,1,1-TRICHLOROETHANE, AND VARIOUS PLATING ACIDS. THE FACILITY ALSO HAD TWO TANKS CONTAINING SPENT HYDROCHLORIC ACID. METHODE ELECTRONICS PART A (NOVEMBER 13, 1982) INCLUDED ① TREATMENT OF F006, F007, F008, F009, AND D002 IN TANKS. ② F002, F003, F005, D002, W002, W003, AND W226 STORAGE IN CONTAINERS. AND ③ F002 STORAGE IN A TANK.

DURING MY INSPECTION 3-55 GALLON DRUMS OF 1,1,1-TRICHLOROETHANE WAS OBSERVED IN THE DRUM STORAGE AREA (SEE PHOTO AND SITE SKETCH). THE FACILITY ALSO HAD TWO 5-GALLON PAILS OF 1,1,1-TRICHLOROETHANE IN THE DRUM STORAGE AREA (SEE PHOTO AND SITE SKETCH). 1,1,1-TRICHLOROETHANE IS GENERATED FROM CLEANING MACHINES. MR. JENSEN AND MR. KUEHNALL DID NOT KNOW ANYTHING ABOUT THE STORAGE TANKS, NO KNOWLEDGE OF WHERE THE ELECTROPLATING AND ETCHING WASTE WENT, OR IF THEY GENERATED THE WASTES LISTED ON THE PART A. THE ELECTROPLATING AND ETCHING EQUIPMENT HAS BEEN REMOVED. 1,1,1-TRICHLOROETHANE



NARRATIVE

IS SENT TO PHILLIPS MANUFACTURING IN CHICAGO. PHILLIPS MFG. RECYCLES THE PENT SOLVENT.

THE FOLLOWING ARE VIOLATIONS OBSERVED DURING THE INSPECTION: ① 703.152 DID NOT AMEND PART A TO INCLUDE STORAGE OF FOOL IN DRUMS.

② 703.154. STORED FOOL IN DRUMS, WHICH WASNT SPECIFIED IN PART A OF THE PERMIT APPLICATION

③ 703.155 DID NOT AMEND PART A TO INCLUDE STORAGE OF FOOL IN DRUMS.

~~④ 703.156 NOT COMPLYING WITH MY INTERIM STATUS STANDARDS 725.~~

⑤ 725.113 NO WASTE ANALYSIS. NO WASTE ANALYSIS PLAN.

⑥ 725.115 NO INSPECTIONS. NO INSPECTION RECORD

⑦ 725.116 NO PERSONNEL TRAINING

~~⑧ 725.131 WITHOUT CONDUCTING INSPECTIONS, THE POSSIBILITY OF A UNPLANNED RELEASE OF HAZARDOUS WASTE MAY OCCUR.~~

⑨ 725.137 NO ARRANGEMENTS WERE MADE TO FAMILIARIZE POLICE AND FIRE DEPARTMENTS AND EMERGENCY RESPONSE TEAMS WITH THE LAYOUT OF THE FACILITY, AND THE HAZARDOUS WASTE HANDLER.

⑩ 725.151 NO CONTINGENCY PLAN.

⑪ 725.155 NO EMERGENCY COORDINATOR

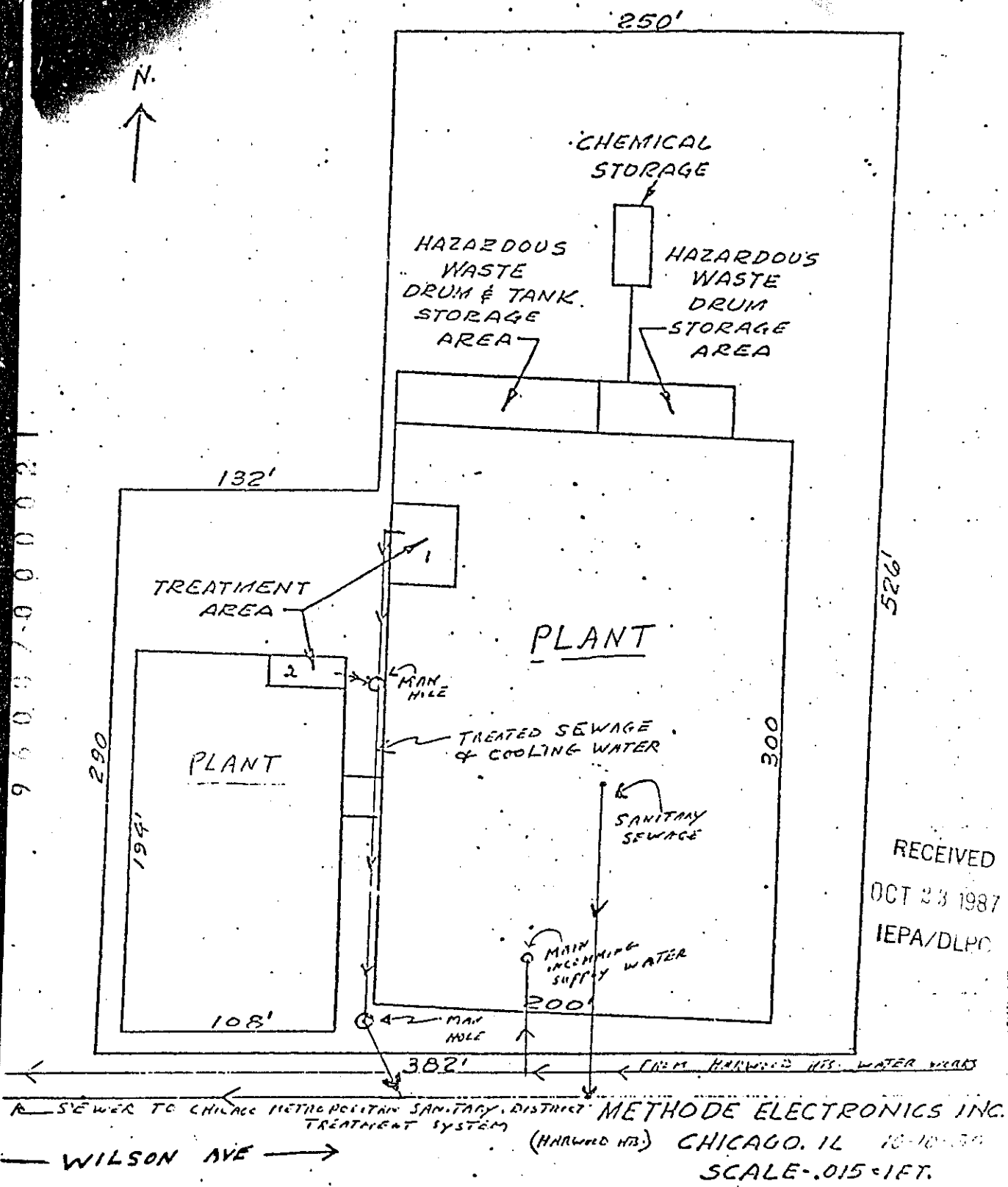
⑫ 725.173 NO OPERATING RECORD

⑬ 725.175 HAS NOT FILED AN ANNUAL REPORT FOR 1986, 1985, 1983, 1982.

RECEIVED

OCT 23 1987

IEPA/DLPC



11-30103 (10-80)



General  
STATE IDENTIFICATION NUMBER  
(If Applicable)

ILD005092135  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Methode Electronics, Inc.  
(B) Street: 7444 W. Wilson Ave.  
(C) City: Chicago (Harwood #13) (D) State: IL (E) Zip Code: 60656  
(F) Phone: (312) 867-9600 (G) County: Cook  
(H) Operator: Same  
(I) Street: \_\_\_\_\_  
(J) City: \_\_\_\_\_ (K) State: \_\_\_\_\_ (L) Zip Code: \_\_\_\_\_  
(M) Phone: \_\_\_\_\_ (N) County: \_\_\_\_\_  
(O) Owner: Same  
(P) Street: \_\_\_\_\_  
(Q) City: \_\_\_\_\_ (R) State: \_\_\_\_\_ (S) Zip Code: \_\_\_\_\_  
(T) Phone: \_\_\_\_\_ (U) County: \_\_\_\_\_  
(V) Date of Inspection: 5-25-82 (W) Time of Inspection (From) 9:10 (To) 10:00  
(X) Weather Conditions: Partly cloudy ~ 75°

(Y) Person(s) Interviewed

Title

Telephone

Bob Schaver

Purchasing Agent

(312) 867-9600

(Z) Inspection Participants

Agency/Title

Telephone

Craig J. Liska

IEPA/ERS I

(312) 345-9780

(AA) Preparer Information

Name

Agency/Title

Telephone

Craig J. Liska

IEPA/ERS I

(312) 345-9780

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

     A. Storage and/or Treatment

1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

     D. Incineration and/or Thermal Treatment  
(O and P)

     E. Chemical, Physical, and Biological  
Treatment (Q)

     B. Land Treatment (M)

     C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Robert Schauer, Purchasing Agent for Methode Electronics was contacted at the time of the inspection. Methode's 7444 W. Wilson facility had previously notified with the USEPA as a Treatment/Storage facility of hazardous waste. Mr. Schauer informed me that this facility had shut down their manufacturing operation at some time near June 1981. The facility used to manufacture printed circuit boards involving a electroplating and etching operation. The facility no longer generates any hazardous waste, however, approximately 25 drums containing primarily waste water treatment sludges, spent perchloroethylene and 1,1,1-trichloroethane, and various plating acids are still present in the building. The facility also has two tanks containing spent hydrochloric acid. Most of the company's equipment has been sold. Mr. Schauer stated that he is currently looking for a company that will pick up and dispose of all the wastes at an economical price. The facility does not possess a written closure plan as required by the RCRA regulations. The facility operator has not notified the US EPA prior to or following the commencement of closure.



TO: Division File DATE: 5-25-82  
FROM: Craig J. Liska  
SUBJECT: General-Cook Co- Chicago / Methode Electronics Inc.  
ILDO05092135

☐ Information only☐ Response requested

Methode Electronics operated at two facilities on Wilson Ave, 7444 and 7447. The company notified that the 7444 Wilson Ave. facility is a storage facility, the 7447 Wilson Ave facility is a small quantity generator. This inspection was conducted with respect to the 7444 Wilson Ave facility. This facility used to manufacture printed circuit boards involving a electroplating and etching operations, however, Mr. Bob Schauer, Purchasing Agent stated that the manufacturing operation closed down on or around June 1, 1981. Since then, the company has been slowly selling the equipment once used in their operations. The facility still has 2 tanks and approximately 25 drums that contain hazardous waste, however, the facility has not generated any waste since June 1981. The two tanks contain spent hydrochloric acid. The 25 drums contain primarily waste water treatment sludges from the plating operation, spent perchloroethylene and III trichloroethane from the cleaning of the PC boards and plating acids. Mr. Schauer stated the SET Liquid Waste was at the facility the day before to estimate the cost of removal. He is looking for the best price prior to making a commitment. He estimates having all the waste removed by 3 to 6 months. This facility does not possess a closure plan as required by the regulations. Mr. Schauer was not familiar with any of the RCRA requirements. He has not notified the USEPA of closure. I gave Mr. Schauer a sample closure plan and suggested that he submit a plan and estimate to our office.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO \_\_\_\_\_  
 DESIGNATED \_\_\_\_\_  
 FACILITY: \_\_\_\_\_

EPA ID NO. \_\_\_\_\_

Under manifest number \_\_\_\_\_ the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator is hereby providing notice that the waste is restricted and the appropriate treatment standards (from Table CCWE of 40 CFR 268.41) are as follows:

<u>Constituent</u>	<u>Treatment Standard</u>	
_____	_____ ppm	Use reverse side
_____	_____ ppm	for additional
_____	_____ ppm	constituents

The constituent compositions based upon ( ) attached data or ( ) knowledge of the waste

TABLE CCWE-CONSTITUENT IN WASTE EXTRACT

	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
F001-F005 spent solvents		
Acetone.....	0.05	0.59
n-Butyl alcohol.....	5.0	5.0
Carbon disulfide.....	1.05	4.81
Carbon tetrachloride.....	.05	.96
Chlorobenzene.....	.15	.05
Cresols (and cresylic acid).....	2.82	.75
Cyclohexanone.....	.125	.75
1,2-Dichlorobenzene.....	.65	.125
Ethyl acetate.....	.05	.75
Ethylbenzene.....	.05	.053
Ethyl ether.....	.05	.75
Isobutanol.....	5.0	5.0
Methanol.....	.25	.75
Methylene chloride.....	.20	.96
Methylene chloride (from the pharmaceutical industry).....	12.7	.96
Methyl ethyl ketone.....	0.05	0.75
Methyl isobutyl ketone.....	0.05	0.33
Nitrobenzene.....	0.66	0.125
Pyridine.....	1.12	0.33
Tetrachloroethylene.....	0.079	0.05
Toluene.....	1.12	0.33
1,1,1-Trichloroethane.....	1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluoroethane.....	1.05	0.96
Trichloroethylene.....	0.062	0.091
Trichlorofluoromethane.....	0.05	0.96
Xylene.....	0.05	0.15

EPA

Generator Name \_\_\_\_\_ ID#: \_\_\_\_\_

Generator Representative Signature \_\_\_\_\_

Name & Title of Representative \_\_\_\_\_

(print or type)